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April 7, 2021

Honorable Jessica S. Allen
United States District Court – District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Angel Alfonso et als. vs. Felix Roque, et als.
Docket No. 2:19-cv-12523

Your Honor:

   Kindly note that this law firm represents Defendant/Third Party-Plaintiff Susan Colacurcio in connection with the above referenced matter.

   In furtherance of the settlement talks between Colacurcio and Third-Party Defendant insurance company (Safety Specialty), it took Safety Specialty one year to appoint coverage counsel, which it eventually did. They have no good reason to not having appointed coverage counsel at the inception of the litigation.

   During that one year, approximately 75 – 80 hours were spent defending Ms. Colaciurcio. She is paying the hourly market rate of $400/hour.

April 7, 2021
Jessica S. Allen, USMJ
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Safety Specialty offered $11,000 to settle Colarcucio's Third Party Claim for fees. Safety Specialty is only willing to pay their attorney-list contract rate of $150. Per hour.

That offer was rejected.

Safety Specialty has owed responsive discovery for over one year. I previously filed a letter to that effect.

Respectfully submitted.

The Law Office of
Deborah L. Pico, LLC

Michael A. Mark, Esq.
By: Michael A. Mark, Esq.

C: All Counsel of Record (via ecourts only)